## Remarks

Claims 1-36 are pending in the application.

Claims 1, 7-9, 12-14, 17, 18, 20, 20, 22, 23, 25, 31-33, 35, and 36 are objected to because of minor informalities.

Claims 2 and 9 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 22-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,638,784 issued to Bartlett et al. on October 28, 2003.

Each of the various rejections and objections are overcome by amendments that are made to the specification, drawing, and/or claims, as well as, or in the alternative, by various arguments that are presented.

Any amendments to any claim for reasons other than as expressly recited herein as being for the purpose of distinguishing such claim from known prior art are not being made with an intent to change in any way the literal scope of such claims or the range of equivalents for such claims. They are being made simply to present language that is better in conformance with the form requirements of Title 35 of the United States Code or is simply clearer and easier to understand than the originally presented language. Any amendments to any claim expressly made in order to distinguish such claim from known prior art are being made only with an intent to change the literal scope of such claim in the most minimal way, i.e., to just avoid the prior art in a way that leaves the claim novel and not obvious in view of the cited prior art, and no equivalent of any subject matter remaining in the claim is intended to be surrendered.

Also, since a dependent claim inherently includes the recitations of the claim or chain of claims from which it depends, it is submitted that the scope and content of any dependent claims that have been herein rewritten in independent form is exactly the same as the scope and content of those claims prior to having been rewritten in independent form. That is, although by convention such rewritten claims are labeled herein as having been "amended," it is submitted that only the format, and not the content, of these claims has been changed. This is true whether a dependent claim has been rewritten to expressly

include the limitations of those claims on which it formerly depended or whether an independent claim has been rewriting to include the limitations of claims that previously depended from it. Thus, by such rewriting no equivalent of any subject matter of the original dependent claim is intended to be surrendered. If the Examiner is of a different view, he is respectfully requested to so indicate.

**Objection to Claims**

Claims 1, 7-9, 12-14, 17, 18, 20, 20, 22, 23, 25, 31-33, 35, and 36 are objected to because of minor informalities.

Applicants have made all the corrections kindly suggested by the Office Action.

**Rejection Under 35 U.S.C. 112, Second Paragraph**

Claims 2 and 9 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claim 2, as originally presented, did not end with a period. This typographical error has been corrected.

Claim 9, as originally presented, did not specify which claim it depended upon. The claim has been amended to reflect its dependence upon claim 6, as was assumed by the Office Action.

**Rejection Under 35 U.S.C. 103(a)**

Claims 22-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,638,784 issued to Bartlett et al. on October 28, 2003.

The Office Action states that Bartlett et al. teaches a packaged MEMS device having a plurality of distinct integrated circuit chips mounted upon the packaging but it does not disclose that one of the chips contains low-voltage D/A converters or that another of the chips contains high-voltage amplifiers, nor any details regarding the plurality of chips. As a result, the Office Action concludes that the subject packaging arrangement is applicable to all types of chips and that one of ordinary skill in the art would know that many optical MEMS devices require low-voltage D/A converters and high-voltage amplifiers, and they would thus use such chips in the Bartlett et al.

arrangement. Furthermore, states the Office Action, the Bartlett et al. disclosure encompasses direct and indirect mounting of either single chips or multiple chips, as well as any desired directionality. Also, the applicants' training and replacing limitations would depend on the types of chips employed, but since the teaching of Bartlett et al. is applicable to all types of chips, these limitations would be obvious.

Applicants respectfully disagree and traverse this ground of rejection for the following reasons.

The Office Action has completely mischaracterized the Bartlett et al. reference. Specifically, there is **no** mounting of multiple chips onto a packaging. as recited in applicants' claims. Instead, in Bartlett et al, chips are initially formed together on a single wafer, the chips are individually capped with a MEMS hermetic cap, and the wafer is then cut to separate the individual capped chips, thus resulting in multiple separate capped MEMS chips. See Bartlett et al., column 2, lines 44-59.

Since Bartlett et al. only teaches a single MEMS chip within a hermetic cap, and there is **no** teaching therein of a packaging on which multiple chips are mounted, as recited in applicants' claims, let alone the other elements of applicants' claims, applicants' claims are allowable over Bartlett et al. under 35 U.S.C. 103.

**Conclusion**

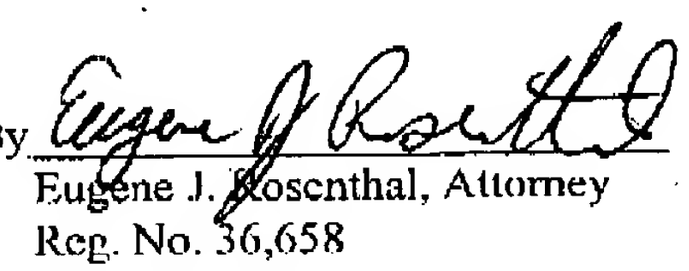
It is respectfully submitted that the Office Action's rejections have been overcome and that this application is now in condition for allowance. Reconsideration and allowance are, therefore, respectfully solicited.

If, however, the Examiner still believes that there are unresolved issues, he is invited to call applicant's attorney so that arrangements may be made to discuss and resolve any such issues.

In the event that an extension of time is required for this amendment to be considered timely, and a petition therefor does not otherwise accompany this amendment, any necessary extension of time is hereby petitioned for, and the Commissioner is authorized to charge the appropriate cost of such petition to the **Lucent Technologies Deposit Account No. 12-2325**.

Respectfully,

R. A. Boie
J. Kim
H. Soh

By 
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Date: 4/19/04